

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION

IN THE MATTER OF:

CAUSE NO. 3:17CV5321 RBL

Alejandro-Ray Pedrotti Calderon

COMPLAINT

PLANTIFF

TRIAL BY JURY

Vs.

IS DEMANDED

DYNAMIC COLLECTORS, INC.

Presented By Plaintiff:

DEFENDANT.

Alejandro-Ray Pedrotti
Calderon

**COMPLAINT FOR VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES
ACT, AND THE STATE OF WASHINGTON DEBT COLLECTION ACT AND
CONSUMER PROTECTION ACT**

Plaintiff, Alejandro Calderon (hereinafter referred to as "Plaintiff"), individually, hereby
sues Defendant, DYNAMIC COLLECTORS, INC (hereinafter referred to as
"Defendant"), for violations of the Fair Debt Collection Practices Act (hereinafter

1 referred to as "FDCPA) at 15 U.S.C. § 1692, the state of Washington's Collection
2 Agency Act at RCW19.16 and Washington's Consumer Protection Act (hereinafter
3 referred to as "WCPA") at RCW 19.86.

4 **JURISDICTION**

- 5 1. This Court has jurisdiction pursuant to 15 U.S.C. § 1692k (d) , 28 U.S.C. § 1331 and
6 jurisdiction over state law claims pursuant to 28 U.S.C. §1367.
7 2. All allegations occurred within one year of the filing date of this complaint.
8 3. Plaintiff made good-faith effort to mediate claim privately. See exhibit J.
9 4. Common law.

10 **VENUE**

- 11 5. Venue is proper pursuant to 28 U.S.C. § 1391 b(2) and 28 U.S.C. § 1391 c(1) , the
12 Defendants transact business and the conduct complained of occurred in the Western
13 District of Washington, and as the Plaintiff resides in the Western District of
14 Washington.

15 **PARTIES**

- 16
17
18 6. The Plaintiff is a natural person, who at all relevant times resided in the State of
19 Washington, County of Pierce, and City of Tacoma.
20 7. The Plaintiff is a "consumer" as defined by 15 U.S.C. § 1692 a(3) and is alleged to be
21 obligated to pay a debt.

1 8. The Defendant is an entity who, allegedly, by use of the mail, or other means, is in
2 the business of collecting debts owed to another and is therefore a debt collector as
3 defined by 15 U.S.C. § 1692 a(6)

4 9. The Defendant is a "debt collector" as defined by 15 U.S.C. § 1692 a(6).

5 10. The Defendant is directly or indirectly engaged in soliciting claims for collection, or
6 collecting or attempting to collect claims owed or due or asserted to be owed or due
7 another person as defined by RCW 19.16.100(4).

8 11. The Defendant is a licensee as defined by RCW 19.16.100(9).

9 **FACTUAL ALLEGATIONS**

10 12. At a time known only to Defendant, Plaintiff's alleged debt was assigned or otherwise
11 transferred to the Defendant for collection.

12 13. The "debt" as defined by 15 U.S.C. § 1692 a(5) is an alleged obligation of Plaintiff to
13 pay money arising out of a transaction in which the money, which is the subject of the
14 transaction are primarily for personal purposes.

15 14. The obligation has been reduced to judgment

16 15. The debt was in default at the time it was obtained by Defendant.

17 16. On Saturday December 10, 2016 Plaintiff received, by mail, a notice demanding
18 payment of \$1,341.44 from the Defendant.

19 17. In notice the Defendant represented the Original Creditor as JEFFERSON COUNTY
20 DISTRICT CRT.

21 18. THE Plaintiff alleges the JEFFERSON COUNTY DISTRICT CRT is not the original
22 creditor.

1 19. In notice the Defendant implied that it was affiliated with the Washington state
2 Department of Licensing "THE COURT MAY NOTIFY THE DEPARTMENT OF
3 LICENSING AND THEY MAY SUSPEND YOUR DRIVER'S LICENSE" and
4 "Once payment is received (which should include all assessments plus interest) we
5 will advise the courts."

6 20. The Plaintiff alleges the Washington state Department of Licensing is a state agency.

7 21. In notice the Defendant implied that it was affiliated with a Washington state court by
8 stating "THE COURT MAY NOTIFY THE DEPARTMENT OF LICENSING AND
9 THEY MAY SUSPEND YOUR DRIVER'S LICENSE" and "Once payment is
10 received (which should include all assessments plus interest) we will advise the
11 courts."

12 22. The Plaintiff alleges the Jefferson County District Court is a court of Washington
13 state.

14 23. In notice the Defendant represented the original amount owed was \$894.00

15 24. In notice the Defendant represented the interest amount owed was \$0.44

16 25. In notice the Defendant represented the collection and miscellaneous fees of \$447.00.

17 26. The Plaintiff alleges the \$447.00 fee is more than 35% of the principal, 894.00.

18 27. The plaintiff alleges the fee is 50% of the principal.

19 28. In notice the Defendant represented the interest accrues at 12% per annum.

20 29. On or about Tuesday, December 13, 2016 Plaintiff mailed, by U.S. Postal Service-
21 First Class Mail, a notice of dispute and request for validation to the Defendant.

1 30. On Saturday, January 12, 2017 Plaintiff received by mail, a response to dispute and
2 request for validation.

3 31. The response notice from the Defendant included an statement itemizing account #
4 3091809 and a uncertified copy of JEFFERSON COUNTY DISTRICT CRT docket
5 case # 6Z0657744.

6 32. The Plaintiff alleges the defendant did not send a copy of the judgment indicating
7 JEFFERSON COUNTY DISTRICT CRT was original creditor or any document that
8 would make it judgment holder.

9 33. The Itemized statement reflected a new balanced owed \$1,357.31.

10 34. The Plaintiff alleges the \$15.87 addition of interest is more than 12% per year.

11 35. The Plaintiff alleges the Defendant and the alleged original creditor have not ceased
12 collection efforts by continuing to suspend Plaintiffs driver's license.

13 36. The Plaintiff alleges the Defendant did not cease collection efforts by adding and
14 billing for interest in response for validation.

15 37. The Plaintiff, Alejandro Calderon, has suffered an injury by having his driver's
16 license suspended, by losing his ability to drive his employer's vehicle to and from
17 jobsites.

18 38. The Plaintiff, Alejandro Calderon, has sustained injuries by having his driver's
19 license suspended, and those injuries include having to pay a fee of \$102.00 to re-
20 instate driver's license and take time off work to do so;

1 39. Plaintiff sustained injury by being exposed to jail and misdemeanor charges for
2 exercising his right to travel freely upon the state's highways traveling to and from
3 work;

4 40. Plaintiff sustained injury in that his professional reputation and marketability have
5 decreased, as plaintiff markets his reliability to travel safely and lawfully to work.

6 41. The Plaintiff alleges the Defendant has no lawful authority to suspend Plaintiffs
7 Driver's License.

8 42. The Plaintiff alleges the alleged primary creditor has no lawful authority to suspend
9 Plaintiffs Driver's License.

10 43. The Plaintiff claims that the Defendant has violated the Washington Consumer
11 Protection Act.

12 44. The Defendant has engaged in an unfair and deceptive act and/or practice.

13 45. The defendant's unfair and deceptive acts and/or practices have occurred in the
14 conduct of the Defendant's trade or commerce.

15 46. Plaintiff alleges these unfair and deceptive acts and practices affect the public
16 interest.

17 47. Plaintiff alleges injuries where sustained in his property.

18 48. Plaintiff alleges that the defendant's unfair and deceptive acts and/or practices were
19 the proximate cause of plaintiff's injuries.

20 49. The Plaintiff alleges that act or practice by the Defendant are injurious to the public
21 interest because it violates a statute that incorporates this chapter, RCW19.86;

1 50. Injured other persons; had the capacity to injure other persons; has the capacity to
2 injure other persons.

3 **COUNT I**

4 51. Plaintiff repeats the foregoing paragraphs as fully restated herein.

5 52. The Defendant made a false implication that it was affiliated with a state, in violation
6 of FDCPA 1692e (1).

7 53. The Defendant implied an affiliation with a State court by stating "THE COURT
8 MAY NOTIFY THE DEPARTMENT OF LICENSING AND THEY MAY
9 SUSPEND YOUR DRIVER'S LICENSE". See exhibit A.

10 **COUNT II**

11 54. Plaintiff repeats the foregoing paragraphs as fully restated herein.

12 55. The Defendant made a false implication that it was affiliated with a state, in violation
13 of FDCPA 1692e (1).

14 56. The Defendant implied an affiliation with a State Agency by stating "THE COURT
15 MAY NOTIFY THE DEPARTMENT OF LICENSING AND THEY MAY
16 SUSPEND YOUR DRIVER'S LICENSE". See exhibit A

17 **COUNT III**

18 57. Plaintiff repeats the foregoing paragraphs as fully restated herein.

19 58. The Defendant made a false and misleading representation that the plaintiff owes
20 JEFFERSON COUNTY DISTRICT CRT \$894.00, in violation of FDCPA 1692e (2).

21 59. The claim is false because the notice provided by the debt collector list the primary
22 creditor as JEFFERSON COUNTY DISTRICT CRT. See exhibits F.

60. The claim is misleading because the notice provided by the debt collector does not list the correct primary creditor. See Exhibit A.

COUNT IV

61. Plaintiff repeats the foregoing paragraphs as fully restated herein.

62. The Defendant made an implication that nonpayment of the debt would result in seizure of any property unless such action was unlawful, in violation of FDCPA 1692e (2).

63. The Defendant implied seizure of Plaintiff's Driver's License until Plaintiff paid debt, assessments, and fees.

64. The seizure of Plaintiff's Driver's License is not authorized according to RCW 46.20.270 (4). See exhibit I, G.

COUNT V

65. Plaintiff repeats the foregoing paragraphs as fully restated herein.

66. The Defendant used and distributed written communication which simulated or falsely represented to be a document authorized, issued, or approved by any court, or which creates a false impression as to its source, authorization, or approval, in violation of FDCPA 1692e (9).

67. The Defendant represented an uncertified copy of the court docket, case # 6Z0657744 as the judgment, when compared to the standard of the least sophisticated consumer or not. See exhibit D.

COUNT VI

COMPLAINT

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*Alejandro-Ray Pedrotti Calderon
1332 East 51 street
Tacoma, Washington 98404
253-245-4581*

1 68. Plaintiff repeats the foregoing paragraphs as fully restated herein.

2 69. The Defendant is collecting an amount (including any interest, fee, charge, or expense
3 incidental to the principal obligation) that is not expressly authorized by the
4 agreement creating the debt or permitted by law, in violation of FDCPA f (1).

5 70. The Defendant is attempting to collect a fee of 50% of the principal, an amount not
6 authorized by law. See exhibit K or RCW 19.16.250 (21).

7 **COUNT VII**

8 71. Plaintiff repeats the foregoing paragraphs as fully restated herein.

9 72. The Defendant is collecting an amount (including any interest, fee, charge, or expense
10 incidental to the principal obligation) that is not expressly authorized by the
11 agreement creating the debt or permitted by law, in violation of FDCPA f (1).

12 73. The Defendant is attempting to collect interest not authorized by agreement or by
13 judgment.

14 **COUNT VIII**

15 74. Plaintiff repeats the foregoing paragraphs as fully restated herein.

16 75. The Defendant is collecting an amount (including any interest, fee, charge, or expense
17 incidental to the principal obligation) that is not expressly authorized by the
18 agreement creating the debt or permitted by law, in violation of FDCPA f (1).

19 76. The Defendant is collecting interest at a rate of more than 12%, an amount not
20 authorized by law. See exhibit C,L, or RCW 19.52.010.

21 **COUNT IX**

22 77. Plaintiff repeats the foregoing paragraphs as fully restated herein.

1 78. The Defendant did not cease collection of the debt, or any disputed portion thereof,
2 until the Defendant obtains verification of the debt or a copy of a judgment, in
3 violation of FDCPA g (2).

4 79. The defendant has not provided Judgment to validate debt.

5 80. By withholding Plaintiff's Driver's License until payment in full was made to
6 Defendant is a collection effort. See exhibit A.

7 81. The Defendant continued collection efforts by adding and billing for interest. See
8 exhibit C.

9 **COUNT X**

10 82. Plaintiff repeats the foregoing paragraphs as fully restated herein.

11 83. The Defendant made a statement which might be construed as indicating an official
12 connection with a county law enforcement agency while engaged in collection agency
13 business, in violation of RCW 19.19.250 (4).

14 84. The Defendant implied an affiliation with a county court by stating "THE COURT
15 MAY NOTIFY THE DEPARTMENT OF LICENSING AND THEY MAY
16 SUSPEND YOUR DRIVER'S LICENSE". See exhibit A.

17 85. A violation of RCW19.16.250 is a Per Se violation of WCPA.

18 86. A violation of indicating an official connection with a county law enforcement
19 agency while engaged in collection agency business is an unfair and deceptive
20 practice in the conduct of DYNAMIC COLLECTIONS. INC. trade or commerce.

21 87. The statute provides as follows: any simulation thereof, or make any statements
22 which might be construed as indicating an official connection with any federal, state,

1 county, or city law enforcement agency, or any other governmental agency, while
2 engaged in collection agency business.

3 **COUNT XI**

4 88. Plaintiff repeats the foregoing paragraphs as fully restated herein.

5 89. The Defendant made a statement which might be construed as indicating an official
6 connection with a State agency while engaged in collection agency business, in
7 violation of RCW 19.19.250 (4).

8 90. The Defendant implied an affiliation with the DEPARTMENT OF LICENSING by
9 stating "THE COURT MAY NOTIFY THE DEPARTMENT OF LICENSING AND
10 THEY MAY SUSPEND YOUR DRIVER'S LICENSE". See exhibit A.

11 91. A violation of RCW19.16.250 is a Per Se violation of WCPA.

12 92. A violation of indicating an official connection with a State agency while engaged in
13 collection agency business is an unfair and deceptive practice in the conduct of
14 DYNAMIC COLLECTIONS. INC. trade or commerce.

15 93. The statute provides as follows: any simulation thereof, or make any statements
16 which might be construed as indicating an official connection with any federal, state,
17 county, or city law enforcement agency, or any other governmental agency, while
18 engaged in collection agency business.

19 **COUNT XII**

20 94. Plaintiff repeats the foregoing paragraphs as fully restated herein.

1 95. The Defendant has not provided the name of the original creditor, and the Defendant
2 has not ceased collection efforts until providing such information, in violation of
3 RCW 19.16.250 (8)(d).

4 96. A violation of RCW19.16.250 is a Per Se violation of WCPA.

5 97. A violation of not providing name of original creditor and failing to cease collection
6 efforts until doing so is an unfair and deceptive practice in the conduct of DYNAMIC
7 COLLECTIONS. INC. trade or commerce.

8 98. The statute provides as follows: (8) send to any debtor any notice, letter, message, or
9 form, other than through proper legal action, process, or proceedings, which
10 represents or implies that a claim exists unless it shall indicate in clear and legible
11 type:

12 (b) The name of the original creditor to whom the debtor owed the claim
13 PROVIDED, that upon written request of the alleged debtor, the licensee shall
14 provide this name to the debtor or cease efforts to collect on the debt until this
15 information is provided;

16 99. The Plaintiff has not provided name of original creditor and continue collection
17 efforts.

18 **COUNT XIII**

19 100. Plaintiff repeats the foregoing paragraphs as fully restated herein.

20 101. The Defendant communicated with the alleged debtor through use of forms or
21 instruments that simulate the form or appearance of judicial process, the form or
22 appearance of government documents, in violation of RCW 19.16.250 (8)(d).

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COMPLAINT

Alejandro-Ray Pedrotti Calderon
1332 East 51 street
Tacoma, Washington 98404
253-245-4581

1 102. A violation of RCW19.16.250 is a Per Se violation of WCPA.

2 103. A violation of communicating with the alleged debtor through use of forms that
3 simulate the form or appearance of government documents is an unfair and deceptive
4 practice in the conduct of DYNAMIC COLLECTIONS. INC. trade or commerce.

5 104. The statute provides as follows: Communicated with the alleged debtor through
6 use of forms or instruments that simulate the form or appearance of judicial process,
7 the form or appearance of government documents.

8 105. The Defendant sent court docket as substitute or simulation of court Judgment.

9 **COUNT XIV**

10 106. Plaintiff repeats the foregoing paragraphs as fully restated herein.

11 107. Communicated with the alleged debtor that the obligation has been increased by
12 charging collection fee when in fact such fees or charges may not legally be added to
13 the existing obligation of such debtor, in violation of RCW 19.16.250 (15).

14 108. A violation of RCW19.16.250 is a Per Se violation of WCPA.

15 109. A violation of communicating with the alleged debtor that obligation has been
16 increased by charging collection fee when in fact such fees or charges may not legally
17 be added to the existing obligation of such debtor is an unfair and deceptive practice
18 in the conduct of DYNAMIC COLLECTIONS. INC. trade or commerce.

19 110. The statute provides as follows: Communicated with the alleged debtor and
20 represent or imply that the existing obligation of the debtor may be or has been
21 increased by the addition of service fees, or any other fees or charges when in fact

1 such fees or charges may not legally be added to the existing obligation of such
2 debtor.

3 111. The Defendant charged collection fee that it was not legally authorized to charge.
4

5 **COUNT XV**

6 112. Plaintiff repeats the foregoing paragraphs as fully restated herein.

7 113. Communicated with the alleged debtor that the obligation has been increased by
8 charging interest when in fact such fees or charges may not legally be added to the
9 existing obligation of such debtor, in violation of RCW 19.16.250 (15).

10 114. A violation of RCW19.16.250 is a Per Se violation of WCPA.

11 115. A violation of communicating with the alleged debtor that obligation has been
12 increased by charging interest when in fact such fees or charges may not legally be
13 added to the existing obligation of such debtor is an unfair and deceptive practice in
14 the conduct of DYNAMIC COLLECTIONS. INC. trade or commerce.

15 116. The statute provides as follows: Communicated with the alleged debtor and
16 represent or imply that the existing obligation of the debtor may be or has been
17 increased by the addition of service fees, or any other fees or charges when in fact
18 such fees or charges may not legally be added to the existing obligation of such
19 debtor.

20 117. The Defendant charged interest fee that it was not legally authorized to charge.

21 **COUNT XVI**

22 118. Plaintiff repeats the foregoing paragraphs as fully restated herein.

119. Threatening to take any action against the alleged debtor which the licensee cannot legally take at the time the threat is made is a violation of RCW 19.16.250 (16).

120. A violation of RCW19.16.250 is a Per Se violation of WCPA.

121. A violation of Threatening to take any action against the alleged debtor which the licensee cannot legally take at the time the threat is made is an unfair and deceptive practice in the conduct of DYNAMIC COLLECTIONS. INC. trade or commerce.

122. The statute provides as follows: Threaten to take any action against the alleged debtor which the licensee cannot legally take at the time the threat is made.

123. The defendant RCW 19.16.250 (16) by implying the withholding of my driver's license until debt was paid, when no authority to withhold my license existed.

COUNT XVII

124. Plaintiff repeats the foregoing paragraphs as fully restated herein.

125. Communicated with the alleged debtor that the obligation has been increased by charging interest when in fact such fees or charges may not legally be added to the existing obligation of such debtor, in violation of RCW 19.16.250 (15).

126. A violation of RCW19.16.250 is a Per Se violation of WCPA.

127. A violation of communicating with the alleged debtor that obligation has been increased by charging interest when in fact such fees or charges may not legally be added to the existing obligation of such debtor is an unfair and deceptive practice in the conduct of DYNAMIC COLLECTIONS. INC. trade or commerce.

128. The statute provides as follows: Communicated with the alleged debtor and represent or imply that the existing obligation of the debtor may be or has been

1 increased by the addition of service fees, or any other fees or charges when in fact
2 such fees or charges may not legally be added to the existing obligation of such
3 debtor.

4 129. The Defendant charged interest fee of more than 12% per year.

5 **COUNT XVIII**

6 130. Plaintiff repeats the foregoing paragraphs as fully restated herein.

7 131. The Defendant attempted to collect in addition to the principal amount of the
8 claim, an amount charged to the debtor for collection services shall not exceed thirty-
9 five percent of the commercial claim, in violation of RCW 19.16.250 (21).

10 132. A violation of RCW19.16.250 is a Per Se violation of WCPA.

11 133. A violation of any amount charged to the debtor for collection services exceeding
12 thirty-five percent of the commercial claim is an unfair and deceptive practice in the
13 conduct of DYNAMIC COLLECTIONS. INC. trade or commerce.

14 134. The statute provides as follows: Collect or attempt to collect in addition to the
15 principal amount of a claim any sum other than allowable interest, collection costs or
16 handling fees expressly authorized by statute, and, in the case of suit, attorney's fees
17 and taxable court costs. A licensee may collect or attempt to collect collection costs
18 and fees, including contingent collection fees, as authorized by a written agreement or
19 contract, between the licensee's client and the debtor, in the collection of a
20 commercial claim. The amount charged to the debtor for collection services shall not
21 exceed thirty-five percent of the commercial claim.

22 135. The defendant charged a collection fee of 50%

COUNT XIX

136. The Plaintiff claims that the Defendant has violated the Washington Consumer Protection Act.

137. The Defendant has engaged in an unfair and deceptive act and/or practice.

138. The Defendant's unfair and deceptive acts and/or practices have occurred in the conduct of the Defendant's trade or commerce.

139. Plaintiff alleges these unfair and deceptive acts and practices affect the public interest.

140. Plaintiff alleges injuries where sustained in his property by the Defendant withholding the Plaintiff's driver's license until Defendant was paid.

141. Plaintiff alleges that the defendant's unfair and deceptive acts and/or practices were the proximate cause of plaintiff's injuries.

142. By the Defendant withholding the Plaintiff's driver's license until Defendant was paid, produced an injury by having his driver's license suspended, by losing his ability to drive his employer's vehicle to and from jobsites. the injuries complained of and without which such injury would not have happened.

COUNT XX

143. The Plaintiff claims that the Defendant has violated the Washington Consumer Protection Act.

144. The Defendant has engaged in an unfair and deceptive act and/or practice.

145. The Defendant's unfair and deceptive acts and/or practices have occurred in the conduct of the Defendant's trade or commerce.

1 146. Plaintiff alleges these unfair and deceptive acts and practices affect the public
2 interest.

3 147. Plaintiff alleges injuries where sustained in his property by the Defendant
4 withholding the Plaintiff's driver's license until Defendant was paid.

5 148. Plaintiff alleges that the defendant's unfair and deceptive acts and/or practices
6 were the proximate cause of plaintiff's injuries.

7 149. By the Defendant withholding the Plaintiff's driver's license until Defendant was
8 paid, produced an injuries by having his driver's license suspended, and those injuries
9 include having to pay a fee of \$102.00 to re-instate driver's license and take time off
10 work to do so;

11 150. Produced an injury by being exposed to jail and misdemeanor charges for
12 exercising his right to travel freely upon the state's highways traveling to and from
13 work;

14 151. Produced an injury in that his professional reputation and marketability have
15 decreased, as plaintiff markets his reliability to travel safely and lawfully to work.

16 152. The injuries complained of and without which such injury would not have
17 happened.

18 **COUNT XXI**

19 153. The Plaintiff claims that the Defendant has violated the Washington Consumer
20 Protection Act.

21 154. The Defendant has engaged in an unfair and deceptive act and/or practice.

1 155. The Defendant's unfair and deceptive acts and/or practices have occurred in the
2 conduct of the Defendant's trade or commerce.

3 156. Plaintiff alleges these unfair and deceptive acts and practices affect the public
4 interest.

5 157. Plaintiff alleges injuries where sustained in his property.

6 158. Plaintiff alleges that the defendant's unfair and deceptive acts and/or practices
7 were the proximate cause of plaintiff's injuries.

8 159. By the Defendant sending a notice to collect a debt and failure to validate it
9 produced injury of \$1357.31 to the Plaintiff, the injuries complained of and without
10 which such injury of \$1357.31 would not have happened.

11
12 **WHEREFORE**, Plaintiff, Alejandro Calderon, demands relief and judgment be entered
13 against Defendant, DYNAMIC COLLECTORS, INC, for counts 1 through 9:

- 14 1. Statutory damages of \$1,000.00 pursuant to the Fair Debt Collection Practices
15 Act, 15 U.S.C. 1692k (2) a;
16 2. Actual Damages of \$102.00 to reinstate Plaintiffs driver's license,
17 3. An award to cover court fee and service fee.
18 4. Any other relief this Honorable Court deems just and proper.

19
20 **WHEREFORE**, Plaintiff, Alejandro Calderon, demands relief and judgment be entered
21 against Defendant, DYNAMIC COLLECTORS, INC, for counts 10 through 20:

- 22 1. Statutory damages of \$2,000.00 for each count , pursuant to the RCW 19.86.140;

1 2. Violation of RCW 19.16 are cumulative pursuant to RCW 19.16.900,

2 3. Injunction imposing additional penalty pursuant to RCW 19.16.450.

3 *If an act or practice in violation of RCW 19.16.250 is committed by a licensee or*
4 *an employee of a licensee in the collection of a claim, neither the licensee, the*
5 *customer of the licensee, nor any other person who may thereafter legally seek to*
6 *collect on such claim shall ever be allowed to recover any interest, service*
7 *charge, attorneys' fees, collection costs, delinquency charge, or any other fees or*
8 *charges otherwise legally chargeable to the debtor on such claim.*

9 4. Any other relief this Honorable Court deems just and proper.

10
11 **WHEREFORE**, Plaintiff, Alejandro Calderon, demands relief and judgment be entered
12 against Defendant, DYNAMIC COLLECTORS, INC, for count 21:

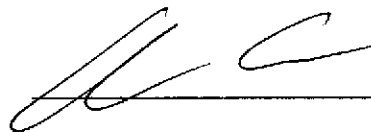
13 1. Damages of \$1,357.31 pursuant to the common law;

14 2. Any other relief this Honorable Court deems just and proper.

15 **Demand for Trial by Jury**

16 Take notice, the Plaintiff, Alejandro Calderon, demands a trial By Jury in this action.

17 Dated: May 1, 2017

18 

19 Alejandro Calderon

20 1332 East 51st Street

21 Tacoma, Washington 98404

Exhibit A

DYNAMIC COLLECTORS INC
790 S MARKET BLVD
CHEHALIS WA 98532
360-748-0420
www.dcipayment.com

ACD 3091809

Date: 12-02-16

CALDERON, ALEJANDRO R
3806 E HOWE ST
TACOMA WA 98404-3728

ACCOUNT #: 3091809 RE: JEFFERSON COUNTY DISTRICT CRT
CITATION #: 6Z0657744 WSP DATE OF LAST PAYMENT TO CREDITOR: 10-25-16

ORIGINAL AMOUNT REFERRED:	\$	894.00
INTEREST:	\$	0.44
ATTORNEY FEES:	\$	0.00
COURT COSTS & FEES:	\$	0.00
COLLECTION FEES & MISC FEES:	\$	447.00
PAYMENTS RECEIVED:	\$	0.00
TOTAL BALANCE DUE:	\$	1341.44

Interest accrues at 12% per annum.

Your citation with the court listed above has been referred to our office for collection. Your payment, or any questions you may have, should be directed to this office. THE COURT WILL REFER YOU DIRECTLY TO US.

IF THIS IS A MOVING VIOLATION CASE, THE COURT MAY NOTIFY THE DEPARTMENT OF LICENSING AND THEY MAY SUSPEND YOUR DRIVER'S LICENSE.

Payment should be made in US currency (if paying in person), money order, or cashiers check. We also accept credit/debit cards on most accounts. Once payment is received (which should include all assessments plus interest) we will advise the courts. Payments should be made out to Dynamic Collectors Inc or DCI. PERSONAL CHECKS MAY BE RETURNED.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice this office will provide you with the name and address of the original creditor, if different from the current creditor.

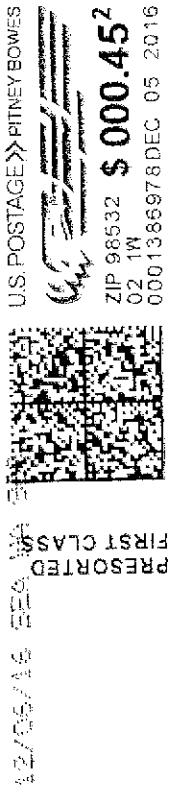
This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.

Exhibit B

90 S MARKET BLVD
HEHALIS WA 98532

ADDRESS SERVICE REQUESTED

CONFIDENTIAL*



141 KSF-IMP SB404
12/05/16 12:05 PM 0001388978

Exhibit C

DYNAMIC COLLECTORS INC
790 S MARKET BLVD
CHEHALIS WA 98532
360-748-0420

D24 3091809

Date: 01-07-17

CALDERON, ALEJANDRO R
1332 EAST 51ST STREET
TACOMA WA 98404-3728

Dear Sir or Madam,

Here is the balance and itemized statement on the following account.

If you have questions regarding your account, please call our office at the number listed above. Interest accrues at 12% per annum.

Account#: 3091809
Creditor: JEFFERSON COUNTY DISTRICT CRT
Creditor account number: 6Z0657744 WSP

ORIGINAL AMOUNT REFERRED:	\$	894.00
INTEREST:	\$	16.31
ATTORNEY FEES:	\$	0.00
COURT COSTS & FEES:	\$	0.00
COLLECTION FEES & MISC FEES:	\$	447.00
PAYMENTS RECEIVED:	\$	0.00
TOTAL BALANCE DUE:	\$	1357.31

This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.

ITMZD

Exhibit D

CASE: E20657744 WSP
Infraction Traffic
Agency No.

DATE	TIME	DESCRIPTION	AMOUNT	CODE
10/21/2016		Case Obligation Selected for Collections		AFM
10/24/2016	0216PM	DEF CALLED FOR JUDGE TO FILE APPEAL		
		Collections: 1st Notice Prepared		
10/25/2016	16299100103	Miscellaneous Payment Received for APP FILING FEE	230.00	LMD
	15299100104	Miscellaneous Payment Received for PREP APP RECORD	40.00	
	16399100105	Miscellaneous Payment Received for PREP TRANSCRIPT	20.00	
		NOTICE OF APPEAL		AFM
10/27/2016		TRANSMITTAL OF RECORD ON APPEAL TO SUPERIOR COURT		
		CLERK'S PAPERS		
		INDEX TO CLERK'S PAPERS		
11/03/2016	0443PM	DEF CALLED IN REGARDS FTA, CLERK ADVISED OF NO PAYMENT OR TPSE. DEF STATED HE FILED AN APPEAL, CLERK ADVISED THIS DOES NOT TOLL ACTION. DEF WILL FILE HIS OWN ACTION		
11/07/2016	1247PM	DEF CALLED ADVISING THE STAY IS AUTOMATIC PENDING AN APPEAL. CLERK ADVISED TO FILE A MOTION		
11/10/2016		DECLARATION IN SUPORT OF MOTION TO STAY		
		MOTION FOR ORDER TO SHOW CAUSE RE: STAY OF JUDGMENT PENDING APPEAL		
		NOI TO JIL		
		ORDER ON MOTION TO STAY JUDGMENT/ORDER-DENIED, INCORRECT COURT		
11/29/2016		Case Obligation Assigned to DYNAMIC COLLECTORS INC for Collections		
12/22/2016		WRITTEN REQUEST FROM DEF REQUESTING CD OF HEARING.		EAR
		CD MAILED THIS DAY.		
		16357100069 Miscellaneous Payment Received for COPY/TAPE FEES	25.00	

	Total Due	Paid	Credit	Balance
Timesave, N	1,184.00	290.00		894.00

Status Date	Status Description	Cln Amt
11/24/2016	Agent Assigned by System	894.00

Case Disposition
Disposition: OPEN

Docket continued on next page

11/12/2016 8:51 AM

JEFFERSON DISTRICT COURT
DOCKETS

PAGE: 1

DEFENDANT

CALDERON, ALEJANDRO R
3806 E HOWE ST
TACOMA WA 98404-2728

CASE: 6Z0857744 USP
Infraction Traffic
Agency No.

Home Phone: 2532242880
Work Phone: 2534262481

AKA No aliases on file.

*** FTA ISSUED ***

OFFICER

09543 USP ELLEFSON, ERIC

CHARGES

Violation Date:	07/23/2016	DV Plea	Finding
1 48.61.400.13	SPEEDING 13 MPH OVER LIMIT N		Committed
2 48.30.020	OP MOT VEH W/OUT INSURANC N		Committed
3 48.61.745	MARIJUANA IN MOTOR VEHICLE N		Committed

TEXT

S 07/23/2016 Received eTicket 6Z0857744 @ 02:04 PM by designated computer SYS
07/25/2016 Case Filed on 07/25/2016 LMD
DEF 1 CALDERON, ALEJANDRO R Added as Participant
OFF 1 ELLEFSON, ERIC Added as Participant
JTR/LOR/TBI fee included in the bail amount
Case linked to electronic ticket 6Z0857744
U 08/09/2016 DEFENDANT REQUESTS CONTESTED HEARING. OAK
S FTA Processing Delayed. Review Date 10/15/2016
U WRITTEN NOTE ON CIT: "JURY TRIAL IS DEMANDED"
S CON Set for 09/26/2016 09:00 AM LMD
in Room 1 with Judge JIL
08/09/2016 Notice Issued for CON on 09/26/2016 09:00 AM
U 08/15/2016 OFFICERS DEC RCVD- TO LMD DESK TCR
S 09/23/2016 CON on 09/26/2016 09:00 AM LMD
Changed to Room 1 with Judge NFH
U 09/26/2016 DEF PRESENT AND SWORN IN
DEF OBJECTS TO DECLARATION AS OFFICER IS NOT PRESENT
MOTION DENIED AS COURT RULES ALLOW DECLARATION IN WRITING.
DEF TESTIFIES.
COURT FINDS ALL THREE COUNTS COMMITTED
S Finding/Judgment of Committed for Charge 1
Case Heard Before Judge HARRISON, NOAH F
Finding/Judgment of Committed for Charge 2
Case Heard Before Judge HARRISON, NOAH F
Finding/Judgment of Committed for Charge 3
Case Heard Before Judge HARRISON, NOAH F
Accounts Receivable Created 842.00
FTA Processing Delay Removed
CON: Held
Proceedings Recorded on Tape No. 0926
Disposition sent electronically to DOL SYS
10/18/2016 FTR Ordered AFM
FTR Issued, Amount Due 894.00 SYS

Docket continued on next page

007028SX 9PM

JEFFERSON DISTRICT COURT
D O C K E T

PAGE: 2

DEFENDANT
CALDERON, ALEJANDRO R

CASE: 670657744 MSP
Infraction Traffic
Agency No.

ADDITIONAL CASE DATA - Continued

Hearing Summary

Held CONTESTED HEARING ON 09/26/2016 AT 09:00 AM IN ROOM 1 WITH NF4

End of docket report for this case

JEFFERSON COUNTY DISTRICT COURT
PO BOX 1220
PORT TOWNSEND, WA 98368

3091809

Exhibit E

790 S MARKET BLVD
CHEHALIS WA 98532

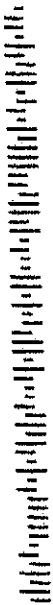
ADDRESS SERVICE REQUESTED

CONFIDENTIAL

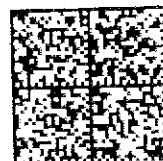
141

LSF-IMP

58404



PRESORTED
FIRST CLASS




U.S. POSTAGE  PITNEY BOWES
ZIP 98532 \$ 000.45²
02 1W
0001386978 JAN 11 2017

Exhibit F

JEFFERSON SUPERIOR COURT 04-25-17 08:52 PAGE 1

CASE#: 16-2-00180-6 JUDGMENT# NO
 TITLE: STATE OF WASHINGTON VS ALEJANDRO CALDERON
 FILED: 10/25/2016
 CAUSE: LCI LOWER COURT APPEAL-INFRACTION DV: N

RESOLUTION: CDTA DATE: 03/27/2017 COURT DECISION TO AFFIRM (APPEAL)
 COMPLETION: JODF DATE: 03/27/2017 JUDGMENT/ORDER/DECREE FILED
 CASE STATUS: APP DATE: 04/24/2017 ON APPEAL
 ARCHIVED:
 CONSOLIDIT:
 NOTE1:
 NOTE2:

----- PARTIES -----

CONN.	LAST NAME, FIRST MI TITLE	LITIGANTS	DATE
PLA01	STATE OF WASHINGTON		
DEF01	CALDERON, ALEJANDRO R		
ATP01	PROSECUTOR		

----- APPEARANCE DOCKET -----

SUB#	DATE	CODE/ CONN	DESCRIPTION/NAME	SECONDARY
1	10/25/2016	NTAPRD	NOTICE OF APPL ON RALJ DEC (LWR CT)	
2	10/26/2016	CRRSP	CORRESPONDENCE FROM COURT ADMIN	
-	10/26/2016	ACTION	ORAL ARGUMENT ON APPEAL - RALJ	
-	10/26/2016	NOTE	BAD DATE; NOTIFIED COURT ADMIN	
3	10/27/2016	CRRSP	CORRESPONDENCE FROM COURT ADMIN	01-20-2017MC
-	10/27/2016	ACTION	ORAL ARGUMENT ON APPEAL	
4	10/27/2016	CLP	CLERK'S PAPERS SENT	
5	12/05/2016	MTSC	MOTION FOR ORDER TO SHOW CAUSE	
6	12/05/2016	DCLR	DECLARATION IN SUPPORT OF MOTION	
7	12/05/2016	PROR	PROPOSED ORDER/FINDINGS	
8	12/12/2016	MTSC	MOTION FOR ORDER TO SHOW CAUSE	
-	12/12/2016		FOR STAY PENDING APPEAL	
9	12/12/2016	DCLR	DECLARATION IN SUPPORT OF MOTION	
10	12/12/2016	MTSC	MOTION FOR ORDER TO SHOW CAUSE	
-	12/12/2016		RE EXTENSION OF TIME	
11	12/12/2016	DCLR	DECLARATION IN SUPPORT	
12	12/12/2016	BR	BRIEF APPELANTS	
13	12/14/2016	ORTSC	ORDER TO SHOW CAUSE (STAY JUDGMENT)	
14	12/14/2016	ORTSC	ORDER TO SHOW CAUSE (EXTENSION OF TIME)	
-	12/14/2016	EXWACT	EX-PARTE ACTION WITH ORDER	
-	12/14/2016	JDG01	JUDGE KEITH C. HARPER	
15	12/14/2016	CRRSP	CORRESPONDENCE COURT ADMINISTRATOR	12-23-2016MC
-	12/14/2016	ACTION	MOTION TO STAY	
16	12/23/2016	MTHRG	MOTION HEARING	
-	12/23/2016		MINUTES	
17	01/11/2017	NT	NOTICE OF CLAIM	
18	01/11/2017	RTS	RETURN OF SERVICE	

16-2-00180-6

JEFFERSON SUPERIOR COURT

04-25-17 08:52 PAGE 2

-----APPEARANCE DOCKET-----

SUB#	DATE	CODE/ CONN	DESCRIPTION/NAME	SECONDARY
19	01/12/2017	RSP	RESPONSE BRIEF ON RALJ STATE'S	
20	01/20/2017	MTHRG	MOTION HEARING	
-	01/20/2017	PEN01	UNDER ADVISEMENT JUDGE HARPER MINUTES	
21	03/27/2017	MM	MEMORANDUM OPINION & ORDER	
-	03/27/2017	EXWACT JDG01	EX-PARTE ACTION WITH ORDER JUDGE KEITH C. HARPER	
22	03/27/2017	CRRSP	CORRESPONDENCE FROM COURT ADMIN	
23	04/24/2017	NACA	NOTICE OF APPEAL TO COURT OF APPEAL	
24	04/24/2017	OB	OBJECTION / OPPOSITION	
25	04/24/2017	AFSR	AFFIDAVIT/DCLR/CERT OF SERVICE	

=====END=====

Exhibit G

IN THE DISTRICT COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF JEFFERSON

FILED

OCT 25 2016

JEFFERSON COUNTY
DISTRICT COURTJefferson County
State of Washington
Plaintiff,No. 620657744

Notice of Appeal

vs

Calderon, Alejandro R.
Defendant.

RECEIVED

OCT 25 2016

The Appellant (print your name) Alejandro R. Calderon seeks review by the
Jefferson County Superior Court of the decision reached in Jefferson County District Court
under cause number 620657744 entered on Sept. 26, 2016 in the above named
Court. Defendants Date of Birth: July 8, 1974 Copies of Notice of Appeal have been
served on all parties.

Trial Court Judge Judge Pro tem Noah Harrison

Specific errors of law claimed are: Judge practicing law from the bench.
Denial of Due Process - unbiased Judge denied jury trial, practicing law by
entering evidence on the record, allowing Hearsay testimony - lacks competence.

☐ Criminal (RALJ) _____
(Include charge description)☐ Civil (RALJ) _____☒ Infraction (RALJ) Speeding, no Insurance, Cannabis in vehicle.☐ Small Claims (De Novo) _____☐ Other _____

Appellant or Attorney for Appellant:

Name Alejandro R. CalderonAddress 1332 E 51st St. Tacoma, WA 98404Telephone 253-245-4581

Respondent or Attorney for Respondent

Name Noah Harrison # 35369Address 210 Polk St Suite 4A Port Townsend, WA 98368Telephone 360-379-8303

Exhibit H



THE SUPERIOR COURT OF THE STATE OF WASHINGTON
COUNTY OF JEFFERSON

KEITH C. HARPER, JUDGE
SUPERIOR COURT
P.O. Box 1220
Port Townsend, WA 98368
(360) 385-9360

RUTH GORDON
SUPERIOR COURT CLERK
P.O. Box 1220
Port Townsend, WA 98368
(360) 385-9128

April 25, 2017

Alejandro Calderon
1332 East 51st Street
Tacoma, WA 98404

RE: State of Washington, Plaintiff/Respondent v Alejandro Calderon, Defendant/Appellant
Jefferson County Cause No. 16-2-00180-6
COA Cause Number (not yet assigned)

Enclosed is a printout of the docket of the case which is being appealed.

Please set out your DESIGNATION OF CLERK'S PAPERS request with three columns for the **document number** (called "Sub#" on the case print out), the **date filed**, and the **document title** corresponding to the columns on the computer print-out. Please list the documents you request in chronological order. Using these crosschecks assures us accuracy in reproducing Clerk's Papers.

If there is something on the printout which is not marked with a "Sub No.," it is not an actual document filed in the case and cannot be included in your Designation.

Also enclosed please find information regarding Transcription Services.

If you have any questions, please call.

Respectfully,

A handwritten signature in black ink, appearing to read "V. Lockhart".

Vicky Lockhart

Deputy Clerk, Superior Court

Enclosures

cc: Jefferson County Prosecutor
Court file

Exhibit I

RCW 46.20.270

Driving offenses—Procedures—Definitions.

(1) Every court having jurisdiction over offenses committed under this chapter, or any other act of this state or municipal ordinance adopted by a local authority regulating the operation of motor vehicles on highways, or any federal authority having jurisdiction over offenses substantially the same as those set forth in this title which occur on federal installations within this state, shall immediately forward to the department a forfeiture of bail or collateral deposited to secure the defendant's appearance in court, a payment of a fine, penalty, or court cost, a plea of guilty or nolo contendere or a finding of guilt, or a finding that any person has committed a traffic infraction an abstract of the court record in the form prescribed by rule of the supreme court, showing the conviction of any person or the finding that any person has committed a traffic infraction in said court for a violation of any said laws other than regulations governing standing, stopping, parking, and pedestrian offenses.

(2) Every state agency or municipality having jurisdiction over offenses committed under this chapter, or under any other act of this state or municipal ordinance adopted by a state or local authority regulating the operation of motor vehicles on highways, may forward to the department within ten days of failure to respond, failure to pay a penalty, failure to appear at a hearing to contest the determination that a violation of any statute, ordinance, or regulation relating to standing, stopping, parking, or civil penalties issued under RCW 46.63.160 has been committed, or failure to appear at a hearing to explain mitigating circumstances, an abstract of the citation record in the form prescribed by rule of the department, showing the finding by such municipality that two or more violations of laws governing standing, stopping, and parking or one or more civil penalties issued under RCW 46.63.160 have been committed and indicating the nature of the defendant's failure to act. Such violations or infractions may not have occurred while the vehicle is stolen from the registered owner. The department may enter into agreements of reciprocity with the duly authorized representatives of the states for reporting to each other violations of laws governing standing, stopping, and parking.

(3) For the purposes of this title and except as defined in RCW 46.25.010, "conviction" means a final conviction in a state or municipal court or by any federal authority having jurisdiction over offenses substantially the same as those set forth in this title which occur on federal installations in this state, an unvacated forfeiture of bail or collateral deposited to secure a defendant's appearance in court, the payment of a fine or court cost, a plea of guilty or nolo contendere, or a finding of guilt on a traffic law violation charge, regardless of whether the imposition of sentence or sanctions are deferred or the penalty is suspended, but not including entry into a deferred prosecution agreement under chapter 10.05 RCW.

(4) Perfection of a notice of appeal shall stay the execution of the sentence pertaining to the withholding of the driving privilege.

(5) For the purposes of this title, "finding that a traffic infraction has

Exhibit J

7016 0750 0001 1482 9687

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee \$3.35
 \$2.75
 Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

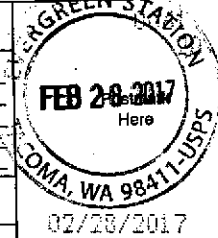
Postage \$0.49

Total Postage and Fees \$6.59

Sent To Dynamic Collectors, Inc.
 Street and Apt. No., or PO Box No. 790 S Market Blvd
 City, State, ZIP+4® Chehalis, WA 98532

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions



EVERGREEN
 4001 S PINE ST
 TACOMA
 WA
 98413-9994
 5483430061
 02/28/2017 (800)275-8777 6:27 PM

Product Description	Sale Qty	Final Price
---------------------	----------	-------------

First-Class Mail Letter	1	\$0.49
-------------------------	---	--------

(Domestic)
 (CHEHALIS, WA 98532)
 (Weight: 0 Lb 0.50 Oz)
 (Expected Delivery Day)
 (Friday 03/03/2017)

Certified	1	\$3.35
-----------	---	--------

(USPS Certified Mail #)

(70160750000114829687)

Return Receipt	1	\$2.75
----------------	---	--------

(USPS Return Receipt #)
 (9590940216646053392786)

Total	\$6.59
-------	--------

Debit Card Remit'd	\$6.59
--------------------	--------

(Card Name: Debit Card)
 (Account #: XXXXXXXXXXXX6148)
 (Approval #:
 (Transaction #: 157)
 (Receipt #: 014608)
 (Debit Card Purchase: \$6.59)
 (Cash Back: \$0.00)

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit USPS.com USPS Tracking or call 1-800-222-1811.

In a hurry? Self-service kiosks offer quick and easy check-out. Any Retail

Alejandro Calderon
1332 East 51st Street
Tacoma, WA 98404

DYNAMIC COLLECTORS INC
790 S MARKET BLVD
CHEHALIS, WA 98532

2-27-2017

Acct #3091809

NOTICE OF PENDING LAWSUIT

To whom it may concern,

This notice is being sent prior to filing a Federal lawsuit, I am offering DYNAMIC COLLECTORS INC an opportunity to amicably cure violations of the Fair Debt Collection Practices Act (FDCPA) 15 U.S.C. § 1692 sections e,f, and g. and the State of Washington's Collection Agency Act (WCAA) RCW 19.16.250 sections 4,7 and 8.

I am willing to settle these matters amicably without having to file suit and am giving you seven days from receipt of this letter to take the opportunity to do so. If DYNAMIC COLLECTORS INC chooses not to settle the matters at hand then I will have no choice but to file suit and seek my remedy in a court of law.

I can be reached directly via email at alexerctors@gmail.com or

1332 East 51st Street
Tacoma, WA 98404

Respectfully submitted.



Alejandro Calderon

Exhibit K

the person to whom the call, text message, or other electronic communication is made. The licensee is not in violation of this subsection if the licensee at least monthly updates its records with information provided by a commercial provider of cellular telephone lists that the licensee in good faith believes provides reasonably current and comprehensive data identifying cellular telephone numbers, calls a number not appearing in the most recent list provided by the commercial provider, and does not otherwise know or reasonably should know that the number belongs to a cellular telephone. Nothing in this subsection may be construed to increase the number of communications permitted pursuant to subsection (13)(a) of this section.

(19) Intentionally block its telephone number from displaying on a debtor's telephone.

(20) In any manner convey the impression that the licensee is vouched for, bonded to or by, or is an instrumentality of the state of Washington or any agency or department thereof.

(21) Collect or attempt to collect in addition to the principal amount of a claim any sum other than allowable interest, collection costs or handling fees expressly authorized by statute, and, in the case of suit, attorney's fees and taxable court costs. A licensee may collect or attempt to collect collection costs and fees, including contingent collection fees, as authorized by a written agreement or contract, between the licensee's client and the debtor, in the collection of a commercial claim. The amount charged to the debtor for collection services shall not exceed thirty-five percent of the commercial claim.

(22) Procure from a debtor or collect or attempt to collect on any written note, contract, stipulation, promise or

Exhibit L

RCW 19.52.010

Rate in absence of agreement—Application to consumer leases.

(1) Every loan or forbearance of money, goods, or thing in action shall bear interest at the rate of twelve percent per annum where no different rate is agreed to in writing between the parties: PROVIDED, That with regard to any transaction heretofore or hereafter entered into subject to this section, if an agreement in writing between the parties evidencing such transaction provides for the payment of money at the end of an agreed period of time or in installments over an agreed period of time, then such agreement shall constitute a writing for purposes of this section and satisfy the requirements thereof. The discounting of commercial paper, where the borrower makes himself or herself liable as maker, guarantor, or indorser, shall be considered as a loan for the purposes of this chapter.

(2) A lease shall not be considered a loan or forbearance for the purposes of this chapter if:

(a) It constitutes a "consumer lease" as defined in RCW 63.10.020;

(b) It constitutes a lease-purchase agreement under chapter 63.19 RCW; or

(c) It would constitute such "consumer lease" but for the fact that:

(i) The lessee was not a natural person;

(ii) The lease was not primarily for personal, family, or household purposes; or

(iii) The total contractual obligation exceeded twenty-five thousand dollars.